

# EXHIBIT 42

**From:** Stacey Grigsby  
**To:** Michael Dell'Angelo  
**Cc:** Patrick Madden; Daniel Silverman; Joseph Saveri (jsaveri@saverilawfirm.com); "Matthew Weiler (MWeiler@saverilawfirm.com)"; Marcy Norwood Lynch; Eric Cramer; "bbrown@cohenmilstein.com"; "Don Springmeyer (DSpringmeyer@wrslawyers.com)"; Kevin Rayhill (krayhill@saverilawfirm.com); Robert C. Maysey (rmaysey@WarnerAngle.com); Nicholas Widnell; Suzanne Jaffe Nero; Rory Skaggs; "jcw@campbellandwilliams.com"; William A. Isaacson; Evan North; Mark R. Suter; Richard A. Koffman; Brent Nakamura  
**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol  
**Date:** Friday, May 26, 2017 1:50:02 AM

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Michael,

2 pm ET would work. We can use my dial-in [REDACTED] passcode [REDACTED]

**Stacey K. Grigsby**

Partner

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**From:** Michael Dell'Angelo [mailto:mdellangelo@bm.net]

**Sent:** Friday, May 26, 2017 1:44 AM

**To:** Stacey Grigsby

**Cc:** Patrick Madden; Daniel Silverman; Joseph Saveri (jsaveri@saverilawfirm.com); 'Matthew Weiler (MWeiler@saverilawfirm.com)'; Marcy Norwood Lynch; Eric Cramer; 'bbrown@cohenmilstein.com'; 'Don Springmeyer (DSpringmeyer@wrslawyers.com)'; Kevin Rayhill (krayhill@saverilawfirm.com); Robert C. Maysey (rmaysey@WarnerAngle.com); Nicholas Widnell; Suzanne Jaffe Nero; Rory Skaggs; 'jcw@campbellandwilliams.com'; William Isaacson; Evan North; Mark R. Suter; Richard A. Koffman; Brent Nakamura

**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Stacey:

I am available to meet and confer between 10:30 am and 4:00 pm ET on Tuesday, May 30<sup>th</sup>. Please let us know what time works for you.

We have no further comments or edits to the protocol. Please clarify if you intend to allow Plaintiffs' vendor to inspect the device and attempt an extraction as you agreed.

Regards,

Michael

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Michael Dell'Angelo

## Berger&Montague,P.C.

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**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]

**Sent:** Friday, May 26, 2017 1:37 AM

**To:** Michael Dell'Angelo <[mdellangelo@bm.net](mailto:mdellangelo@bm.net)>

**Cc:** Patrick Madden <[pmadden@bm.net](mailto:pmadden@bm.net)>; Daniel Silverman <[dsilverman@cohenmilstein.com](mailto:dsilverman@cohenmilstein.com)>; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)) <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))' <[MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com)>; Marcy Norwood Lynch <[mlynch@BSFLLP.com](mailto:mlynch@BSFLLP.com)>; Eric Cramer <[ecramer@bm.net](mailto:ecramer@bm.net)>; 'bbrown@cohenmilstein.com' <[bbrown@cohenmilstein.com](mailto:bbrown@cohenmilstein.com)>; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))' <[DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com)>; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)) <[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)>; Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)) <[rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)>; Nicholas Widnell <[NWidnell@BSFLLP.com](mailto:NWidnell@BSFLLP.com)>; Suzanne Jaffe Nero <[snero@BSFLLP.com](mailto:snero@BSFLLP.com)>; Rory Skaggs <[RSkaggs@BSFLLP.com](mailto:RSkaggs@BSFLLP.com)>; 'jcw@campbellandwilliams.com' <[jcw@campbellandwilliams.com](mailto:jcw@campbellandwilliams.com)>; William A. Isaacson <[wisaacson@bsfllp.com](mailto:wisaacson@bsfllp.com)>; Evan North <[ENorth@BSFLLP.com](mailto:ENorth@BSFLLP.com)>; Mark R. Suter <[msuter@bm.net](mailto:msuter@bm.net)>; Richard A. Koffman <[rkoffman@cohenmilstein.com](mailto:rkoffman@cohenmilstein.com)>; Brent Nakamura <[bnakamura@BSFLLP.com](mailto:bnakamura@BSFLLP.com)>

**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Michael,

As we stated in our opposition to your motion to compel ECF No. 395-98, Zuffa had previously agreed to allow Plaintiffs' vendor to attempt to extract messages from Mr. White's Flip Phone. In your email from May 16, 2017, you represented that "will take a look at the updated draft and revert" to Zuffa. We still have not received your comments on the draft.

To address your point about efforts to inspect the Nokia 6101 Flip Phone should extraction fail, such a proposal is unnecessary since a forensic analysis firm was able to extract text messages. Please advise why, at this time, Plaintiffs believe that the parties should formulate alternative procedures for reviewing the text messages "if the extraction fails."

Finally, please let me know your availability on Tuesday, May 30 for a meet and confer conference on Plaintiffs' request to have their own vendor inspect the phone and Plaintiffs' assertion that "we have no assurance that Defendant's third attempt at extraction, well after the close of discovery, was complete or reliable."

Best,  
Stacey

**Stacey K. Grigsby**

Partner

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**From:** Michael Dell'Angelo [<mailto:mdellangelo@bm.net>]

**Sent:** Thursday, May 25, 2017 11:46 AM

**To:** Stacey Grigsby

**Cc:** Patrick Madden; Daniel Silverman; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)); 'Matthew Weiler' ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com)); Marcy Norwood Lynch; Eric Cramer; 'bbrown@cohenmilstein.com'; 'Don Springmeyer' ([DSpringmeyer@wrsllawyers.com](mailto:DSpringmeyer@wrsllawyers.com)); Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)); Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)); Nicholas Widnell; Suzanne Jaffe Nero; Rory Skaggs; 'jcw@campbellandwilliams.com'; William Isaacson; Evan North; Mark R. Suter; Richard A. Koffman; Brent Nakamura

**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Stacey:

When may we expect a response, as promised. From our perspective, the only open issue was an agreement on alternatives in the event that Plaintiffs' vendor could not extract text messages from the Flip Phone. Frankly, we were waiting on your promised proposal to conclude the remainder of the protocol.

Despite the fact that we provided you with several rounds of changes to the protocol, had an agreement to allow Plaintiffs' vendor to attempt an extraction and Zuffa's failed to provide a proposed means of review in the event the extraction was unsuccessful, you represented to the court that: "After Plaintiffs stated that they wanted to engage their own vendor to attempt to get these text messages, Zuffa agreed and proposed a joint protocol to transport the phone to Plaintiffs. As of this date, Plaintiffs have not agreed to or made additional comments on the draft protocol to extract text messages." (ECF No. 409, at 12).

We also understand that, despite your agreement and our negotiations, Zuffa again acted unilaterally and without informing Plaintiffs and attempted to extract data from the Flip Phone. Defendant's conduct is not consistent with our negotiations or the terms of the ESI Stipulation. We expect that Zuffa will honor its agreement and allow Plaintiffs' vendor to inspect the Flip Phone and attempt to extract text messages from it, particularly as we have no assurance that Defendant's third attempt at extraction, well after the close of discovery, was complete or reliable.

Regards,

Michael

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Michael Dell'Angelo

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---

**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]

**Sent:** Tuesday, May 16, 2017 11:52 PM

**To:** Michael Dell'Angelo <[mdellangelo@bm.net](mailto:mdellangelo@bm.net)>

**Cc:** Patrick Madden <[pmadden@bm.net](mailto:pmadden@bm.net)>; Daniel Silverman <[dsilverman@cohenmilstein.com](mailto:dsilverman@cohenmilstein.com)>; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)) <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))' <[MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com)>; Marcy Norwood Lynch <[mlynch@BSFLLP.com](mailto:mlynch@BSFLLP.com)>; Eric Cramer <[ecramer@bm.net](mailto:ecramer@bm.net)>; 'bbrown@cohenmilstein.com' <[bbrown@cohenmilstein.com](mailto:bbrown@cohenmilstein.com)>; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))' <[DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com)>; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)) <[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)>; Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)) <[rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)>; Nicholas Widnell <[NWidnell@BSFLLP.com](mailto:NWidnell@BSFLLP.com)>; Suzanne Jaffe Nero <[snero@BSFLLP.com](mailto:snero@BSFLLP.com)>; Rory Skaggs <[RSkaggs@BSFLLP.com](mailto:RSkaggs@BSFLLP.com)>; 'jcw@campbellandwilliams.com' <[jcw@campbellandwilliams.com](mailto:jcw@campbellandwilliams.com)>; William A. Isaacson <[wisaacson@bsfllp.com](mailto:wisaacson@bsfllp.com)>; Evan North <[ENorth@BSFLLP.com](mailto:ENorth@BSFLLP.com)>; Mark R. Suter <[msuter@bm.net](mailto:msuter@bm.net)>; Richard A. Koffman <[rkoffman@cohenmilstein.com](mailto:rkoffman@cohenmilstein.com)>; Brent Nakamura <[bnakamura@BSFLLP.com](mailto:bnakamura@BSFLLP.com)>

**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Hello Michael,

We will consider ways in which we can permit Plaintiffs to review responsive and text messages that cannot be extracted from the Flip Phone and revert back to you.

Best,  
Stacey

**Stacey K. Grigsby**

Partner

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---

**From:** Michael Dell'Angelo [<mailto:mdellangelo@bm.net>]  
**Sent:** Tuesday, May 16, 2017 1:56 PM  
**To:** Stacey Grigsby  
**Cc:** Patrick Madden; Daniel Silverman; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)); 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))'; Marcy Norwood Lynch; Eric Cramer; 'bbrown@cohenmilstein.com'; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))'; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)); Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)); Nicholas Widnell; Suzanne Jaffe Nero; Rory Skaggs; 'jcw@campbellandwilliams.com'; William Isaacson; Evan North; Mark R. Suter; Richard A. Koffman; Brent Nakamura  
**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Stacey:

We will take a look at the updated draft and revert to you.

We appreciate Defendant's willingness to allow Plaintiffs' vendor to attempt to extract ESI from the Flip Phone. However, if the extraction fails, we believe that the parties should agree on a framework for the review and production of ESI on the Flip Phone.

During the meet and confer process Plaintiffs raised numerous ways in which Zuffa could have made the responsive text messages on Mr. White's Nokia Flip Phone available for review by Plaintiffs. Specifically, we raised the possibility of an "inspection" as contemplated by Fed.R.Civ.P. 34(a). Alternatively, because Zuffa elected to conduct a linear review of all text messages, we proposed that Zuffa could have reviewed the text messages for responsiveness and (subject to an agreement by the parties), had the responsive texts transcribed. We believe both of these options remain viable alternatives if the extraction fails. We also invited Defendant to propose alternatives.

We welcome your views on the alternatives proposed by Plaintiffs and look forward to any alternative approaches Defendant may wish to propose.

Regards,

Michael

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---

**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]

**Sent:** Tuesday, May 16, 2017 1:26 PM

**To:** Michael Dell'Angelo <[mdellangelo@bm.net](mailto:mdellangelo@bm.net)>  
**Cc:** Patrick Madden <[pmadden@bm.net](mailto:pmadden@bm.net)>; Daniel Silverman <[dsilverman@cohenmilstein.com](mailto:dsilverman@cohenmilstein.com)>; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)) <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))' <[MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com)>; Marcy Norwood Lynch <[mlynch@BSFLLP.com](mailto:mlynch@BSFLLP.com)>; Eric Cramer <[ecramer@bm.net](mailto:ecramer@bm.net)>; 'bbrown@cohenmilstein.com' <[bbrown@cohenmilstein.com](mailto:bbrown@cohenmilstein.com)>; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))' <[DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com)>; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)) <[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)>; Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)) <[rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)>; Nicholas Widnell <[NWidnell@BSFLLP.com](mailto:NWidnell@BSFLLP.com)>; Suzanne Jaffe Nero <[snero@BSFLLP.com](mailto:snero@BSFLLP.com)>; Rory Skaggs <[RSkaggs@BSFLLP.com](mailto:RSkaggs@BSFLLP.com)>; 'jcw@campbellandwilliams.com' <[jcw@campbellandwilliams.com](mailto:jcw@campbellandwilliams.com)>; William A. Isaacson <[wisaacson@bsfllp.com](mailto:wisaacson@bsfllp.com)>; Evan North <[ENorth@BSFLLP.com](mailto:ENorth@BSFLLP.com)>; Mark R. Suter <[msuter@bm.net](mailto:msuter@bm.net)>; Richard A. Koffman <[rkoffman@cohenmilstein.com](mailto:rkoffman@cohenmilstein.com)>; Brent Nakamura <[bnakamura@BSFLLP.com](mailto:bnakamura@BSFLLP.com)>  
**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Hello Michael,  
Attached are our redlines on top of the version you sent last night. This version includes the section on the Designated Agents.

Thank you,  
Stacey

**Stacey K. Grigsby**

Partner

---

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---

**From:** Michael Dell'Angelo [<mailto:mdellangelo@bm.net>]

**Sent:** Monday, May 15, 2017 8:22 PM

**To:** Stacey Grigsby

**Cc:** Patrick Madden; Daniel Silverman; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)); 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))'; Marcy Norwood Lynch; Eric Cramer; 'bbrown@cohenmilstein.com'; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))'; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)); Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)); Nicholas Widnell; Suzanne Jaffe Nero; Rory Skaggs; 'jcw@campbellandwilliams.com'; William Isaacson; Evan North; Mark R. Suter; Richard A. Koffman; Brent Nakamura

**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Stacey:

Attached is a redline with a few minor edits on top of yours. A section should be added to

define the parties' respective "Designated Agents." I will serve in that capacity for Plaintiffs.

Regards,

Michael

---

Michael Dell'Angelo

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---

**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]

**Sent:** Sunday, May 14, 2017 5:28 PM

**To:** Michael Dell'Angelo <[mdellangelo@bm.net](mailto:mdellangelo@bm.net)>

**Cc:** Patrick Madden <[pmadden@bm.net](mailto:pmadden@bm.net)>; Daniel Silverman <[dsilverman@cohenmilstein.com](mailto:dsilverman@cohenmilstein.com)>; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)) <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))' <[MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com)>; Marcy Norwood Lynch <[mlynch@BSFLLP.com](mailto:mlynch@BSFLLP.com)>; Eric Cramer <[ecramer@bm.net](mailto:ecramer@bm.net)>; 'bbrown@cohenmilstein.com' <[bbrown@cohenmilstein.com](mailto:bbrown@cohenmilstein.com)>; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))' <[DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com)>; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)) <[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)>; Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)) <[rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)>; Nicholas Widnell <[NWidnell@BSFLLP.com](mailto:NWidnell@BSFLLP.com)>; Suzanne Jaffe Nero <[snero@BSFLLP.com](mailto:snero@BSFLLP.com)>; Rory Skaggs <[RSkaggs@BSFLLP.com](mailto:RSkaggs@BSFLLP.com)>; 'jcw@campbellandwilliams.com' <[jcw@campbellandwilliams.com](mailto:jcw@campbellandwilliams.com)>; William A. Isaacson <[wisaacson@bsfllp.com](mailto:wisaacson@bsfllp.com)>; Evan North <[ENorth@BSFLLP.com](mailto:ENorth@BSFLLP.com)>; Mark R. Suter <[msuter@bm.net](mailto:msuter@bm.net)>; Richard A. Koffman <[rkoffman@cohenmilstein.com](mailto:rkoffman@cohenmilstein.com)>; Brent Nakamura <[bnakamura@BSFLLP.com](mailto:bnakamura@BSFLLP.com)>

**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Hello Michael,

I think we are very close to an agreement. We have a few minor edits on top of yours. Please let us know if you want to discuss our edits.

Best,

Stacey

**Stacey K. Grigsby**

Partner

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**From:** Michael Dell'Angelo [<mailto:mdellangelo@bm.net>]  
**Sent:** Friday, May 12, 2017 3:25 PM  
**To:** Stacey Grigsby  
**Cc:** Patrick Madden; Daniel Silverman; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)); 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))'; Marcy Norwood Lynch; Eric Cramer; 'bbrown@cohenmilstein.com'; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))'; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)); Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com)); Nicholas Widnell; Suzanne Jaffe Nero; Rory Skaggs; 'jcw@campbellandwilliams.com'; William Isaacson; Evan North; Mark R. Suter; Richard A. Koffman  
**Subject:** RE: Le v. Zuffa, LLC - Proposed Text Message Protocol

Stacey:

Thank you for the draft protocol. Attached is a redline for your consideration. Please let me know if you would like to discuss any of the proposed changes.

Regards,

Michael

---

Michael Dell'Angelo  
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**From:** Stacey Grigsby [<mailto:SGrigsby@BSFLLP.com>]  
**Sent:** Tuesday, May 9, 2017 6:10 PM  
**To:** Michael Dell'Angelo <[mdellangelo@bm.net](mailto:mdellangelo@bm.net)>  
**Cc:** Patrick Madden <[pmadden@bm.net](mailto:pmadden@bm.net)>; Daniel Silverman <[dsilverman@cohenmilstein.com](mailto:dsilverman@cohenmilstein.com)>; Joseph Saveri ([jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)) <[jsaveri@saverilawfirm.com](mailto:jsaveri@saverilawfirm.com)>; 'Matthew Weiler ([MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com))' <[MWeiler@saverilawfirm.com](mailto:MWeiler@saverilawfirm.com)>; Marcy Norwood Lynch <[mlynch@BSFLLP.com](mailto:mlynch@BSFLLP.com)>; Eric Cramer <[ecramer@bm.net](mailto:ecramer@bm.net)>; 'bbrown@cohenmilstein.com' <[bbrown@cohenmilstein.com](mailto:bbrown@cohenmilstein.com)>; 'Don Springmeyer ([DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com))' <[DSpringmeyer@wrslawyers.com](mailto:DSpringmeyer@wrslawyers.com)>; Kevin Rayhill ([krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)) <[krayhill@saverilawfirm.com](mailto:krayhill@saverilawfirm.com)>; Robert C. Maysey ([rmaysey@WarnerAngle.com](mailto:rmaysey@WarnerAngle.com))

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**Subject:** Le v. Zuffa, LLC - Proposed Text Message Protocol

Dear Michael,

Pursuant to our meet and confer on Friday, May 5, please find Zuffa's proposed protocol for the extraction of text messages from Mr. White's Nokia 6101 flip phone. Please let us know if you would like to discuss.

Best,  
Stacey

**Stacey K. Grigsby**

Partner

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